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California Regional Water Quality Control Board

Central Coast Region



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August 3, 2009

Charlie Ebeling
Public Works Director
City of Carpinteria
5775 Carpinteria Avenue
Carpinteria, CA 93013

Dear Mr. Ebeling

WATER BOARD STAFF COMMENTS ON CITY OF CARPINTERIA DECEMBER 2008 DRAFT STORMWATER MANAGEMENT PROGRAM

On December 24, 2008, the Central Coast Water Quality Control Board (Water Board) received City of Carpinteria's (City) Draft Stormwater Management Plan (SWMP). Water Board staff has reviewed the December 2008 draft SWMP and we have identified improvements that the City must make for us to recommend approval of the SWMP. We present the specific improvements that are needed in the attached Draft Table of Required Revisions. In addition, we have identified four overarching issues with the SWMP that must be corrected, discussed directly below. Please respond with a revised SWMP addressing the Draft Table of Required Revisions and the issues discussed below prior to the Water Board's final review and consideration of public comment.

SWMP Specificity

The City's SWMP continues to lack detail and specificity for many of the Best Management Practices (BMPs), as previously stated in our September 17, 2008 letter. The Draft SWMP does not adequately define proposed BMPs and measurable goals (MGs). Many of the statements are vague and ambiguous. A robust SWMP should include specific details of program development, implementation, and enforcement. The SWMP must clearly demonstrate to the public the actions the City will implement to reduce the discharge of pollutants to the maximum extent practicable. The SWMP must include descriptions of who, what, where, why, and how program elements will be implemented. SWMP activities included in BMPs must be clearly defined as MGs to determine progress of SWMP implementation. Each MG must quantitatively define the scope and magnitude of BMP implementation. Please see the draft Table of Required Revisions below for examples.

SWMP Organization

The SWMP is often hard to navigate when trying to locate desired information. The narrative description of BMPs must include a description of associated MGs along with each BMP. BMP tables are helpful for quick reference but do not contain necessary detail as provided in narrative description. Please include MGs within narrative description of BMPs for consistency and accessibility.



Effectiveness Assessment

MS4s are required to annually assess the appropriateness and effectiveness of their BMPs. Again, many of the City's BMPs and/or measurable goals do not have quantifiable assessment parameters to meet this requirement. Assessment parameters should not be confused with measurable goals. While measurable goals indicate effort (i.e. miles off road swept, number of brochures distributed, etc.), assessment parameters are related to effectiveness (i.e. public surveys of outreach efforts, pre-post training evaluation, reduction in use of pesticides, etc.) Effectiveness assessment discussions in the SWMP are often excluded or do not provide appropriate detail to be evaluated effectively. For example, many of the BMPs and MGs within the Illicit Discharge Detection and Elimination (IDDE) minimum control measure (MCM) do not provide effectiveness measurements. The City could provide response cards to complainants that provide them with resolution of their complaint, a direct call number for continued discharge events, and a program evaluation survey. Information generated by this tool can then be used to measure the effectiveness of many of the BMPs in the IDDE program.

It is important to assess BMP and program effectiveness so that your program evolves and improves over time. For SWMPs to adequately address the issue of effectiveness assessment, we expect them to include the following components:

1. Assessment of program effectiveness in achieving permit requirements and measurable goals.
2. Assessment of program effectiveness in protecting and restoring water quality and beneficial uses.
3. Identification of quantifiable effectiveness measurements for each BMP, including measurements that link BMP implementation with improvement of water quality and beneficial use conditions.
4. Emphasis on assessment of BMPs specifically targeting primary pollutants of concern.
5. Incorporation of an effectiveness assessment process comparable to that outlined in CASQA's *Municipal Stormwater Program Effectiveness Assessment Guide*.
6. Identification of a range of quantifiable effectiveness measurements that collectively assess effectiveness in terms of regulatory compliance, changes in knowledge and awareness, changes in behavior, and pollutant load reductions, to be used during annual effectiveness assessments. The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters.
7. Identification of quantifiable effectiveness measurements that collectively assess effectiveness in terms of runoff and receiving water quality, to be used during long-term effectiveness assessments (e.g., every three to five years). The *Municipal Stormwater Program Effectiveness Assessment Guide* includes useful examples and guidance for assessing effectiveness using these parameters.
8. Identification of the steps the City will take to revise the SWMP and optimize BMP effectiveness, when effectiveness assessments identify BMPs or programs that are ineffective or need improvement.

To the extent that these components are already included in your SWMP or are readily available for inclusion, we expect you to keep them in the SWMP or incorporate them. However, we do not expect the SWMP to fully address each of the above components prior to approval. As an alternative, you must include in your SWMP a BMP for development and implementation of an effectiveness assessment strategy. We expect the effectiveness assessment strategy to address each of the items identified above.



An example of the type of language you should include in the SWMP for such a BMP follows:

“The City will develop an effectiveness assessment strategy during the first full implementation year and submit it as an update to the SWMP with the first annual report. The effectiveness assessment strategy will be used to conduct effectiveness assessments included in the annual reports, starting with the second annual report. Overall, the strategy will describe the actions that will be taken to assess the effectiveness of the SWMP in meeting regulatory requirements and improving water quality and beneficial use conditions. The strategy will specifically address: identification of the processes to be used to conduct effectiveness assessments and improve BMP implementation; identification of quantifiable BMP and program effectiveness measurements; establishment of links between BMP implementation and improvement in water quality and beneficial use conditions; and assessment of BMP implementation in terms of regulatory compliance, changing awareness, changing behavior, pollutant load reductions, and runoff and receiving water quality.”

Primary Pollutants of Concern

Again, many of the MCMs do not include BMPs that particularly target primary pollutants of concern (POCs). As stated in previous correspondence, Water Board staff has identified pathogens (indicator bacteria) and nutrients as primary POCs in water bodies of the South Coast, including Carpinteria Creek, Carpinteria Marsh, and Franklin Creek. BMPs must be developed and implemented to specifically focus on controlling sources of pathogens and nutrients within the City's jurisdiction. Water Board staff acknowledges that the City will conduct an assessment and prioritization of illicit discharges as part of BMP 3.1.7, but the City must include BMPs currently that target the primary POCs for the SWMP to be approved.

In addition to the above items, we require the City to make the modifications listed in the attached Draft Table of Required Revisions.

The following sequence describes an optimal process for final review of the SWMP:

Water Board staff will:

- 1) Post the attached draft Table of Required Changes on August 3, 2009 on the same webpage where the SWMP is posted for the 60-day public comment period. Water Board staff will announce the web posting, including web address, to all known interested persons by email.
- 2) At the close of the 60-day public comment period on October 2, 2009, Water Board staff will review comments received on the SWMP from the public, including comments from the City describing their changes to the SWMP. Changes from the City should be provided in a revised SWMP for approval.
- 3) Water Board staff will prepare a final Table of Required Changes and a final recommendation on the adequacy of the SWMP. Staff will also prepare a response to comments received during the 60-day public comment period.
- 4) If Water Board staff recommends approval of the SWMP, the Water Board's Executive Officer may approve the the City's SWMP and coverage under the General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (General Permit), contingent on the City making the required revisions to its SWMP by a date certain (generally within 60 days of the approval letter). The Executive Officer will post the approval letter with required revisions on the Water Board website.
- 5) Alternatively, if a member of the public or the City requests a Water Board hearing during the 60-day public comment period, Water Board staff will provide



recommendations to the Water Board on the City's SWMP (with the required revisions) at the December 10, 2009 Water Board Meeting.

If you have questions regarding this matter, please contact **Brandon Sanderson at (805) 549-3868**, or bsanderson@waterboards.ca.gov.

Sincerely,



Roger W. Briggs
Executive Officer

cc: (by electronic mail)
Jane Gray, DUDEK Engineering
Brandon Steets, Geosyntec Inc.
Kira Redmond, Santa Barbara Channelkeeper
Hilary Hauser, Heal the Ocean

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ATTACHMENT 1
DRAFT TABLE of REQUIRED REVISIONS
City of Carpinteria Draft SWMP December 2008

Acronyms:

BMP	- Best Management Practice
CASQA	- California Stormwater Quality Association
CEQA	- California Environmental Quality Act
IDDE	- Illicit Discharge Detection and Elimination
MCM	- Minimum Control Measure
MG	- Measurable Goal
SWMP	- Storm Water Management Plan
SWPPP	- Storm Water Pollution Prevention Plan
POCs	- Pollutants of Concern

Item Number	SWMP Section	Subject	Problem	Required Revisions
1	1.0 Public Education	BMP Development	<p>This section does not identify link between BMP development and implementation and primary POCs.</p> <p>This section also does not discuss the audiences the City will target and the content of outreach efforts.</p>	<p>Revise BMPs 1.1.1, 1.1.3, 1.1.5, and 1.1.9 to emphasize primary POCs in education and outreach materials and efforts. For example outreach should focus on proper handling of trash (especially plastic debris), pet waste management, septic system maintenance, fertilizer use, hydromodification, automotive activities, etc.</p> <p>Revise BMPs 1.1.1, 1.1.5, and 1.1.9 to discuss the target audience and content of outreach.</p>
2	1.0 Public Education	BMP Selection Community-based Social Marketing	The Public Education and Outreach BMPs rely heavily on information campaigns that utilize education and advertising to encourage behavior change. While these efforts can be effective in creating public awareness	Include a BMP that commits to assessing community-based social marketing strategies, and incorporating them into your program where appropriate.

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			<p>and in changing attitudes, numerous studies show that behavior change rarely occurs as a result of simply providing information.</p> <p>One particularly promising approach to public education is community-based social marketing. Community-based social marketing is based upon research in the social sciences that demonstrates that behavior change is most effectively achieved through initiatives delivered at the community level which focus on removing barriers to an activity while simultaneously enhancing the activities benefits. More information on community-based social marketing is available at: http://www.cbsm.com/. The techniques of community-based social marketing should be considered when developing and implementing your public education and outreach program.</p>	
3	1.0 Public Education BMP 1.1.8	Stormwater Hotline	The BMP lacks detail, specificity, and effectiveness assessment.	Revise the BMP and MGs to include tracking of calls including the location, nature and time of day of incidents reported. Include follow-through procedures including response time. Provide assessment parameters for evaluating the effectiveness of the BMP.
4	2.0 Public	Community Interest Group	The BMP does not contain assessment parameters.	Revise the BMP to include proper assessment parameters, such as

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	Participation BMP 2.1.1	BMP Effectiveness Assessment		documenting participation and evaluating meeting content and presentation.
5	2.0 Public Participation BMP 2.1.7	Community Clean-ups BMP Effectiveness Assessment	The BMP does not contain appropriate assessment parameters.	Revise the BMP to include tracking the amount of trash collected as an assessment parameter along with tracking participation as currently stated.
6	2.0 Public Participation	BMP Development	<p>The SWMP lacks the requirement on the part of the City to involve the public in review and commenting on draft SWMP revisions and ordinances.</p> <p>The MCM does not ensure diverse public involvement.</p>	<p>Add a BMP equivalent to the following: The City will solicit public comments on draft SWMP revisions and ordinances, provide sufficient time for the public to comment, and respond to comments by incorporating revisions into draft SWMP revisions and ordinances as appropriate.</p> <p>Ensure that the City includes a diverse cross-section of people for concerns, ideas, etc.</p>
7	3.0 IDDE	BMP Development	This section does not identify the link between BMP development/implementation and primary POCs.	Revise the BMPs to ensure they control primary POCs (e.g., pathogens, nutrients, trash, and sediment)
8	3.0 IDDE BMP 3.1.1	Storm Drain Map	The BMP does not include regular updates.	Include a MG that states the City will update the storm drain map annually.
9	3.0 IDDE BMP 3.1.3	Spill and Complaint Response	<p>The BMP lacks detail about complaint investigation, identification, and follow-up procedures.</p> <p>The BMP does not ensure tracking and</p>	<p>Revise the BMP to provide more detail regarding response procedures. Include a MG that ensures forwarded complaints will be tracked and followed-up on.</p> <p>Include complaint procedures for off hour and</p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
			<p>follow-up occurs, specifically with forwarded complaints. The BMP does not include response procedures for emergency discharges during off hours and weekends.</p> <p>The BMP is not clear in its enforcement strategies and procedures.</p>	<p>weekend calls.</p> <p>Include re-inspection of key abated discharges to eliminate reoccurrence.</p> <p>Provide clarity for an escalating enforcement strategy (e.g. 1st offence - provide education and written notice to discharger with cleanup and abatement deadlines. 2nd offence – NOV with minimum daily penalties. 3rd offence – administrative civil liability penalties [fines] or referral to district attorney's office).</p>
10	3.0 IDDE BMP 3.1.3	Field Investigations and Abatement	The BMP lacks detail about investigation procedures.	Revise the BMP to provide detail on field investigation procedures, including the number of field personnel assigned to inspections, when and how often inspections will be conducted, and how they will be conducted (e.g., drive by, on foot, etc.).
11	3.0 IDDE BMP 3.1.4	Coordination with Jurisdictional Agencies	<p>The BMP lacks detail regarding stormwater permit requirements and agency coordination.</p> <p>Hazardous Spill Response is not clearly addressed in the SWMP.</p>	<p>Revise the BMP to include the development of educational resources, stormwater training, and inspection tools (checklists) to provide cooperative agencies knowledge of stormwater pollution provisions and issues to assist in the identification of illicit discharges.</p> <p>Add a BMP to review and update the hazardous spill response program and training to address potential discharges to the MS4. Include hazardous spill response procedures.</p>

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12	3.0 IDDE BMP 3.1.6	Municipal Stormwater Code	This BMP lacks detail on the code approval process. The BMP states that new language will be developed and adopted by end of year 2. The City must have a general sense of the development and approval process.	Revise the BMP to include detail on the development and adoption of the municipal code, including a tentative schedule that includes at least one widely advertised public meeting to solicit input on the content of the code before it is presented to the City Council.
13	3.0 IDDE BMP 3.1.6	Municipal Stormwater Code	Procedures for enforcement must be included in the SWMP.	Include a description of potential enforcement procedures to be included in the code for use as part of an escalating enforcement strategy.
14	3.0 IDDE BMP 3.1.6	Municipal Stormwater Code	The scope of the code is not described.	The BMP must include current regulations applicable to illicit discharges. The BMP must indicate that pet waste, including horse waste, restrictions are included in the code.
15	3.0 IDDE BMP 3.1.6	Exempt Non-Storm Water Discharges	This section does not provide adequate detail (no BMPs or MGs included) for the City's proposed evaluation of exempt non-storm water discharges to determine if they have the potential to be significant sources of pollutants.	Add BMPs and MGs, including a schedule, for the evaluation of non-stormwater discharges identified as exempt under the General Permit to determine their potential to be significant sources of pollutants. For those non-stormwater discharges identified as having the potential to be significant sources of pollutants, confirm that the City will prohibit such non-stormwater discharges from entering the MS4, or describe the BMPs the City will require in order to control the pollutants in the non-stormwater discharges.
16	3.0 IDDE BMP 3.1.7	Geographical Assessment	The BMP lacks detail regarding action items developed from the assessment.	Revise the BMP to include action items resulting from the assessment and illicit discharge map (e.g., prioritize business and

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				industrial facility inspections, prioritize creeks for dry weather inspections, prioritize POCs, and develop new BMPs).
17	3.0 IDDE BMP 3.1.8	Stormwater Monitoring	The current scope of this BMP is limited.	Revise the BMP to include a description of the current monitoring efforts (e.g., where monitoring is taking place, when and how often are samples taken, what constituents are sampled for, who is conducting the sampling, etc.). Explain what is meant by "the City will encourage monitoring efforts."
18	3.0 IDDE	IDDE Training	The SWMP lacks IDDE training for municipal staff. The City does not commit to making the detection and elimination of illicit discharges a priority.	Include a BMP to train City staff (especially field staff) on IDDE requirements, inspection, and enforcement procedures.
19	4.0 Construction Runoff Control	Inadequate MCM Details for Construction Runoff Controls	The current scope of this MCM is limited.	<p>Revise the SWMP to acknowledge that the City is required to establish construction site controls for sites less than an acre that are part of a larger common plan of development.</p> <p>Add BMPs demonstrating that the City will comply with General Permit requirements to:</p> <p>(1) develop and implement an ordinance or other regulatory mechanism to require erosion and sediment controls, as well as sanctions, or other effective mechanisms to ensure compliance,</p> <p>(2) develop requirements for construction site operators to control waste such as discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the</p>

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				construction site that may cause adverse impacts to water quality, and (3) develop procedures for receipt and consideration of information submitted by the public.
20	4.0 Construction Runoff Control	Construction Site Operator Education & Training	The City does not address how it will educate construction site personnel about stormwater pollution prevention.	Include a BMP that describes how the City will educate and train construction personnel on projects within the City's jurisdiction and the proper implementation of stormwater runoff controls (e.g., City sponsored trainings and fact sheets). Include information on proper site planning, minimization of soil movement, capture of sediment, and good housekeeping.
21	4.0 Construction Runoff Control BMP 4.1.1	Discretionary Project Review	The BMP lacks an appropriate MG.	Include a MG to develop a guidance document for the City's Standard Conditions. Include a statement that the City will review and update the Standard Conditions as appropriate.
22	4.0 Construction Runoff Control BMP 4.1.3	Construction Site Inspection and Enforcement	The BMP fails to provide information on how the City will evaluate the effectiveness of review procedures, inspections, and City follow-up actions based on inspections (e.g., enforcement).	Revise the BMP and MGs to demonstrate that the City will track site information, including: owner, contractor, start and completion dates, size in acres, inspection dates, findings from inspections, complaints received, and the City's response to complaints. This information can inform the City's assessment of the effectiveness of its review, inspection, and follow-up procedures. Include a MG stating the City will review and

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				update the existing ordinance in year 1.
23	4.0 Construction Runoff Control BMP 4.1.3	Construction Site Enforcement	The BMP lacks detail regarding standard City procedures and enforcement.	Revise the BMP to provide a summary of the standard City procedures and escalating enforcement strategy steps used by the City.
24	4.0 Construction Runoff Control BMP 4.1.4	Staff Training	The scope of training is not clearly indicated. The BMP lacks an appropriate MG.	Revise the BMP to state the City will train staff on proper installation, operation, and maintenance of construction site BMPs, as well as inspection methods and enforcement strategies. Include a MG to develop a stormwater inspection checklist to assist inspectors in the field.
25	5.0 Post- Construction Runoff Controls BMP 5.1.2	Interim Hydromodification Criteria	While the City discusses the modification and implementation of the City of Santa Barbara Storm Water BMP Guidance Manual as interim hydromodification criteria, there is uncertainty in the final outcome and implementation of the interim criteria as modified from the guidance manual. We provide three options for the development of the interim criteria that must be included in the City's SWMP.	Modify the SWMP to include the development of interim hydromodification criteria using one of the options listed below: Option 1: The proposed criteria may include the following types of requirements which provide a high degree of assurance of effective hydromodification control without regard to the nuances of individual watersheds: 1. For new and re-development projects, Effective Impervious Area ¹ shall be

¹ Effective Impervious Area is that portion of the impervious area that drains directly to a receiving surface waterbody via a hardened storm drain conveyance without first draining to a pervious area. In other words, impervious surfaces tributary to pervious areas are not considered Effective Impervious Area.

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				<p>maintained at less than five percent (5%) of total project area.</p> <p>2. For new and redevelopment projects that create and/or replace 5,000 square feet or more of impervious surface, the post-construction runoff hydrographs shall match within one percent (1%) the pre-development² runoff hydrographs, for a range of events with return periods from 1-year to 10-years.</p> <p>3. For projects whose disturbed project area exceeds two acres, preserve the pre-development drainage density (miles of stream length per square mile of watershed) for all drainage areas serving a first order stream³ or larger, and ensure that post-project time of concentration is equal or greater than pre-project time of concentration.</p> <p>Other acceptable approaches to develop interim criteria that are as effective as Option 1 include:</p> <p>Option 2: Adopt and implement hydromodification criteria developed by another local municipality and approved by the Water Board, such as the criteria the Water Board adopted for the City of Salinas, as interim</p>

² Pre-development condition is defined as the native vegetation and soil conditions that exist prior to human influence (e.g., urbanization, agriculture, grazing, timber harvest).

³ A first order stream is defined as a stream with no tributaries.

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				<p>criteria.</p> <p>OR</p> <p>Option 3: The City shall Use the following methodology to develop interim flow control and infiltration criteria:</p> <ol style="list-style-type: none">1. Identify a range of runoff flow rates for which post-project runoff flow rates and durations shall not exceed pre-project runoff rates and durations, where the increased discharge rates and durations will result in off-site erosion or other significant adverse impacts to beneficial uses. Pre-project refers to the condition immediately prior to the proposed project. The condition includes, but is not limited to, soil type, vegetation, and amount of impervious surface. Establish numeric criteria for development projects to maximize infiltration on-site and approximate natural infiltration levels to the maximum extent practicable and to effectively implement applicable low-impact development strategies.2. Identify the projects, including project type, size and location, to which the City will apply the interim criteria. The projects to which the City will apply the interim criteria will include all those

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				<p>projects that will cause off-site erosion or other significant adverse impacts to beneficial uses.</p> <p>3. Identify methods to be used by project proponents to demonstrate compliance with the interim discharge rate and duration criteria, including continuous simulation of the entire rainfall record.</p> <p>4. Identify methods to be used by project proponents to demonstrate compliance with the interim infiltration criteria, including analysis of site imperviousness.</p>
26	5.0 Post-Construction Runoff Controls BMP 5.1.3	Long-Term Watershed Protection	The City must commit to providing long-term watershed protection. The City has provided examples of its efforts of watershed protection through land use policies, plans, ordinances, guidance manuals, and BMPs. However, the City must provide more detail and evidence that these will achieve desired watershed conditions.	Include a BMP stating how and when the City will 1) develop quantifiable measures that indicate how the City's watershed protection efforts achieve desired watershed conditions, 2) evaluate the existing watershed protection efforts (the referenced land use policies, plans, ordinances, guidance manuals, and BMPs), and 3) adapt or change the existing efforts if necessary.
27	5.0 Post-Construction Runoff Controls BMP 5.1.5	Policy Reviews & Updates	Many of the BMPs described under this MCM, which discuss "project development review procedures," lack appropriate detail concerning the development and review/update of those policies and procedures. The City lists many programs and resources (e.g., CEQA Guidelines & Checklist,	Add individual BMPs or MGs within the MCM to state when updates and revisions to cited guidelines, conditions, and measures will occur. Also explain the revision and approval procedures. For example: Identify when the City will review and revise the CEQA guidelines to include consideration of urban water quality impacts.

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			interpretive and implementation guidelines, conditions of approval, mitigation measures) that will be used under this MCM, some of which the City states will be developed or reviewed and updated.	<p>Include a statement that the City will apply standard conditions of approval to all projects.</p> <p>During all requested planner consultation meetings and Development Review Committee meetings, educate applicants on the need for stormwater control. Include a statement that the City will implement interpretive and implementation guidelines and include them in application packages.</p>
28	5.0 Post-Construction Runoff Controls BMP 5.1.5	Project Design Approval	The City's review process for new and re-development projects as described lacks adequate detail to know whether the process could allow project environmental analysis to conclude without evaluation of specific stormwater management BMPs proposed.	<p>Modify the section in the BMP that describes the "Application Submittal" so it is consistent with the following, or add a BMP equivalent to the following:</p> <p>The City will insure that applications are only deemed complete if they identify the types of post-construction BMPs to be implemented and their locations.</p> <p>In addition, identify in the SWMP the particular stage(s) in the City's development project review/approval process that will be used to apply all specific hydromodification control/LID criteria and standards to development projects.</p>
29	5.0 Post-Construction	Inspection Procedures	This BMP lacks specificity regarding inspection protocol and the tracking system.	Add or revise the BMP to indicate when and how often inspections will occur to ensure correct BMP installation, maintenance, and

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	Runoff Controls BMP 5.1.8			functionality. Include measures to ensure that inspectors are informed of the conditions, measures, and control BMPs they must track.
30	5.0 Post-Construction Runoff Controls BMP 5.1.8	Enforcement	The BMP does not have a description of penalty provisions or tracking for non-compliance with standards or conditions of approval.	Add a BMP identifying specific enforcement procedures and the range of penalties for non-compliance. Include a statement that the City will track enforcement of post-construction storm water controls that are required as conditions of approval in Years 2 through 5.
31	5.0 Post-Construction Runoff Controls	General Permit Attachment 4 Design Standards	The City does not address Attachment 4 provisions in the SWMP as required to achieve the maximum extent practicable standard and to protect water quality.	Include BMPs and MGs to implement Attachment 4 Design Standards as outlined in the General Permit.
32	6.0 Pollution Prevention for Municipal Operations	Inadequate MCM Details	The Pollution Prevention and Good Housekeeping for Municipal Operations control measure lacks adequate detail and specificity. (See the City of Santa Barbara and Santa Maria SWMPs for examples of adequate content).	Revise the SWMP to provide more detailed discussion of program elements. The discussion must include who, what, where, why, how, and when statements.
33	6.0 Pollution Prevention for Municipal Operations BMP 6.1.1	Municipal Facility and Operations Individual SWMPs.	The BMP does not discuss which facilities or operations could adversely impact stormwater and require a site or activity specific SWMP.	Revise the BMP to include MGs to develop a facility and operation inventory. This should include Public Works maintenance yards, fleet yards, water and waste water treatment plants, and public facilities (i.e., golf courses, parks, etc.), as well as maintenance and construction activities.

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				<p>Include a MG to conduct evaluation of facilities and operations to determine their impacts to stormwater. Provide a schedule and time table for the evaluations.</p> <p>Include a MG to inspect facilities and operations annually for compliance.</p> <p>Include a MG to revise individual SWMPs periodically (include a timeframe for revision).</p>
34	6.0 Pollution Prevention for Municipal Operations BMP 6.1.2	Purchasing and Contract Regulation	This BMP lacks clarification and detail about how contracts containing stormwater pollution prevention specifications will be regulated and enforced.	<p>Revise the BMP to add procedures for evaluating compliance and taking enforcement action if contracts are violated.</p> <p>Include language in the existing MG stating that the City will revise contract language to contain stormwater pollution prevention provisions.</p> <p>Add a MG stating that contractors will be periodically (include timeframe) audited for compliance.</p> <p>Add a MG that states contract language will be enforced for 100% of projects. Include enforcement procedures.</p> <p>Add a MG stating contract language will be periodically reviewed (include timeframe) for effectiveness.</p>

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35	6.0 Pollution Prevention for Municipal Operations BMP 6.1.3	Integrated Pest Management Strategies	This BMP lacks sufficient detail to ensure the progressive development of Integrated Pest Management strategies.	<p>Include a MG that states the City will reduce the use of pesticides by a particular percentage annually.</p> <p>Include a MG that states the City will periodically (include timeframe) evaluate current procedures and explore new procedures to improve effectiveness of Integrated Pest Management strategies over time.</p>
36	6.0 Pollution Prevention for Municipal Operations BMP 6.1.4	Street Sweeping	The BMP lacks sufficient detail to evaluate the effectiveness of the program. The BMP seems to have had its description left out of the narrative (see sentence #3, pg 71).	<p>Revise the BMP to include a complete description of activities. Include in the description the approximate miles of roadway swept, and percentage of the City's jurisdictional roadways swept.</p> <p>Include a MG to track the amount of trash collected to evaluate BMP effectiveness.</p>
37	6.0 Pollution Prevention for Municipal Operations BMP 6.1.5	Catch Basin and CDS Unit Cleaning	The BMP lacks sufficient detail and effectiveness assessment information. Staff questions whether the cleaning of catch basins once a year is suitable.	<p>Include a MG that states an inspection schedule will be developed for all catch basins in Year 1.</p> <p>Include a MG that states cleaning efforts will be evaluated annually to determine the effectiveness of the proposed cleaning frequency.</p>
38	6.0 Pollution Prevention for Municipal Operations	Mutt-Mitt Program	The BMP lacks sufficient detail and effectiveness assessment information for prevention of pet waste discharges.	<p>Include a MG that states dispensers will be refilled more frequently as needed.</p> <p>Include a MG that states all dispensers will include signage addressing the pet waste</p>

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	BMP 6.1.6			<p>ordinance and associated enforcement provisions as developed in the municipal code.</p> <p>Include a MG that states the City will enforce the pet waste ordinance for 100% of identified violations. Describe the enforcement procedures in SWMP.</p> <p>Include a MG to annually evaluate the pet waste ordinance and enforcement procedures to assess the effectiveness of the program.</p>
39	6.0 Pollution Prevention for Municipal Operations BMP 6.1.7	Municipal Staff and Contractor Training	The BMPs lack detail on the scope of training and evaluation of its effectiveness.	<p>Revise the BMP to include training for contract employees. Explain the contract employee training schedule.</p> <p>Revise the BMP to include the scope of training the City will conduct. Training topics should include proper vehicle washing and maintenance, park and open space maintenance, fleet and building maintenance, new construction and land disturbance activities, stormwater system maintenance, hydromodification and LID requirements, etc.</p> <p>Include a MG that states all training sessions will be evaluated for effectiveness. Pre/post training quizzes could be used as part of these evaluations.</p>

Item Number	SWMP Section	Subject	Problem	Required Revisions
40	6.0 Pollution Prevention for Municipal Operations	MS4 Maintenance Operations	The BMP lacks a description of the maintenance activities and procedures implemented to prevent pollutant discharges to the MS4.	Include a BMP to develop a schedule for maintenance of City facilities (e.g., public roads, bridges, sidewalks, and building facades) to prevent pollutants from entering the MS4 (e.g. paving and painting materials, street and sidewalk washwater, dredge spoil, accumulated sediments, floatables, debris, etc.). Identify procedures for proper removal of collected waste.
41	6.0 Pollution Prevention for Municipal Operations	Hazardous Spill Response	This issue is not addressed.	Revise the BMP to state the City will update its hazardous spill response and training to address potential discharges to the MS4.